

**REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

**I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 39-42, 44, 45, 47-49, 51, 52 and 54 are currently pending. Claims 39, 44, 51, 52 and 54, which are independent, are hereby amended. Claims 1-38, 43, 46, 50 and 53 have been canceled, without prejudice or disclaimer of subject matter. No new matter has been introduced. Support for this amendment is provided throughout the Specification as originally filed, and specifically, at page 22, line 22 to page 23, line 15. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

**II. REJECTIONS UNDER 35 U.S.C. §103(a)**

Claims 39-42, 44-49, 51, 52 and 54 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 4,742,215 to Daughters et al. in view of U.S. Patent No. 5,988,510 to Tuttle et al.

Claim 39 recites, *inter alia*:

“An information processing device...

wherein said plurality of user blocks are allocated in an ascending order, said plurality of system blocks are allocated in a descending order, and a boundary between the plurality of user and system blocks is variable; and

wherein said plurality of system blocks are classified into at least three areas, a system defining block area, a defining block area, and a service defining block area.” (emphasis added)

As understood by Applicants, U.S. Patent No. 4,742,215 to Daughters et al.

relates to an IC information card that includes a programmed microprocessor and a nonvolatile read/write memory (EPROM) embedded in a plastic card. Terminal contacts on the face of the card enable interfacing with a reader/writer coupled to a host computer, such as an IBM-XT. The data storage portion of the memory in the card is segmented into one or more data zones, each requiring either no access code or one or more access codes to be entered in the card in order to access (read and/or write) that zone. Segmentation of the card memory and the assignment of required access codes are achieved by writing a zone definition table and one or more access codes into the card memory using a special access code that is fixed in the microprocessor program.

As understood by Applicants, U.S. Patent No. 5,988,510 to Tuttle et al. relates to a method of protecting data in a smart card from unauthorized access, the method comprising the steps of providing a housing defined by first and second housing portions; employing a volatile memory in the smart card for storing the data, and supporting the volatile memory from the first housing portion; providing a power supply in the housing, the power supply maintaining the data in the volatile memory while the power supply is connected to the volatile memory; and

connecting the power supply to the volatile memory using a conductor supported by and movable with the second housing portion.

Applicants submit that Daughters and Tuttle - taken either alone or in combination - do not teach or suggest the above-identified features of claim 39. Specifically, Applicants submit that there is no teaching or suggestion of a plurality of user blocks that are allocated in an ascending order, a plurality of system blocks that are allocated in a descending order, and that a boundary between the plurality of user and system blocks is variable; and wherein the plurality of system blocks are classified into at least three areas, a system defining block area, a defining block area, and a service defining block area, as recited in claim 39. Therefore, Applicants submit that independent claim 39 is patentable.

For reasons similar to or somewhat similar to those described above with regard to independent claim 39, amended independent claims 44, 51, 52 and 54 are also believed to be patentable.

Therefore, Applicants submit that independent claims 39, 44, 51, 52 and 54 are patentable.

### **III. DEPENDENT CLAIMS**

The other claims are dependent from one of the independent claims, discussed above, and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

**CONCLUSION**

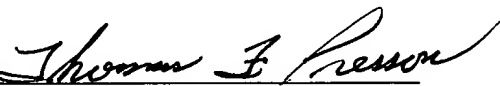
In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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